

## Firearms Safety Report



**National Security Academy**  
**26070 Blue Star Hwy**  
**Havana/Tallahassee, Florida 32333**

## ***USDA APHIS Wildlife Services*** ***2008 Firearm Safety Review***

**USDA APHIS Wildlife Services Firearm Safety Review**

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## ***Purpose of Review***

*In 2007 Wildlife Services authorized and initiated a programmatic review of all aspects of their National Safety Program. This report specifically addresses firearms and pyrotechnic safety training, policies and procedures.*

*The following report was compiled after six (6) site visits, including observation of a firearms training workshop and participation in (8) field operations. Information was gathered from more than 120 Wildlife Services employees including State Directors, District Supervisors, Firearms Trainers, Biologists, Field Employees and participants on the Firearms Review Committee.*

*Based upon review of the WS Directives, Firearms Training Manual, State Office Evaluations, Field Inspection Reviews, and Employee Interviews, this report presents findings and recommendations relative to firearm and pyrotechnic safety within the Wildlife Services Program.*

## **Background**

*Wildlife Services Employees are involved in Wildlife Management, not sport hunting or law enforcement. They frequently conduct wildlife damage management operations under difficult or unusual conditions in both rural and urban settings, sometimes in high profile situations. When firearms are used, Wildlife Services personnel must be highly competent and demonstrate a thorough understanding of firearm safety in all their actions. Safety will not be compromised for any reason. (USDA WS Firearm Safety Manual 2002).*

*Wildlife Services is unique among the APHIS programs within the Federal Government. They use firearms and pyrotechnics on a daily basis more than any other Federal, State or Local Law Enforcement entity. While they are not considered a law enforcement entity, many of the "tools" they use and training they receive is very similar to the tools used and training received in law enforcement training programs. They frequently conduct wildlife management operations under difficult or unusual conditions in both rural and urban settings, often in high profile situations.*

*Wildlife Services' mission has grown over the years. In addition to providing solutions to ranchers and farmers, their expertise has necessitated urban solutions as well. Many of the Wildlife Services cooperators are airports (both military and private), local and state government as well as urban corporations. Providing safe solutions to wildlife damage becomes paramount in these environments.*

*Unfortunately, as society continues to become more litigious it is of greater importance to have a sound firearm safety program. This is the insurance policy that programs and agencies must have in place to reduce liability; ensure the competence and safe use of firearms to humanely dispatch wildlife; protect the well being of WS employees; and to protect the public.*

## **WS Employee Firearm Safety Training Objective**

*To develop in Wildlife Services employees, the basic knowledge, skill, and attitude essential for the safe and efficient use of firearms in the performance of their duties.*

### **Knowledge is defined as:**

*The expertise and skills acquired by a person through experience and education.*

### **Skill is defined as:**

*The ability to do something well, based on knowledge, practice, and aptitude.*

### **Attitude is defined as:**

*One's mental state, including beliefs, feelings, and values, and the disposition to act in a certain way. Attitude is a difficult concept to teach or learn, and is most often acquired through the practice, demonstration, and actions of others.*

*The concept of firearm safety "attitude" must start from the top in order to have a "trickle-down" effect. Attitude must be endorsed by credible role models such as leaders of a corporation or respected employees within an organization or agency. They must display enthusiasm for those in charge and they must actively participate in the activity to help others see the value. Firearm safety must be endorsed by authority and must be actively demonstrated through actions so that others understand and recognize the value and importance.*

## **Directives**

**WS Directive 2.615 04/07/06**

**WS Firearm Use and Safety** -This directive establishes guidelines for the use of firearms in the conduct of official duties and prescribes standard training requirements.

***For the purpose of this Directive, handguns, rifles, and shotguns are considered firearms. This directive also covers pyrotechnic pistols, net guns, paint ball guns, dart guns, air rifles, arrow guns, and crossbows.***

*This adequately addresses "what is considered a firearm."*

***Use and possession of firearms must be in accordance with applicable Federal, State, and Local laws and regulations.***

*This adequately addresses use and possession; however, most WS employees were unfamiliar with the Federal and State laws governing their States. Adding a copy of the applicable Federal and State laws to their Firearms manuals with additional training would be sufficient.*

***All firearms used in the performance of official duties will be furnished with a locking device (e.g. trigger lock).***

*100% of States were in compliance. One of the States that we visited interpreted this to mean that employees had to keep trigger locks on their firearms at all times, except when in immediate use, others had trigger locks on their firearms inside locked boxes and inside safes. In addition, use of some trigger locks disabled use of firearm safeties.*

***Recommendation:*** Trigger locks should be used when no safe, vault or cabinet is available for storage. Use of safeties is paramount to safe gun handling and should always be on when firearms are not in immediate use.

***Firearms may be transported or carried in an accessible manner when immediate use is necessary or likely.***

## Directives

*This does not adequately address the question of how to “safely” transport a firearm in a vehicle. During site visits it was observed that there was no uniform method of transporting firearms. Some employees placed their firearms on the seat behind them, some on the passenger seat beside them, some on the floor behind their seats etc. There was no uniformity in the direction that the muzzles were pointing.*

**Recommendation:** Vehicles should be equipped with a rack or storage device that securely holds the firearm until it is ready for use. The rack should be of a design that allows for easy access and that allows the action to be locked open. Muzzle down floorboard racks are recommended.

**Firearms will not have a cartridge in the chamber while being transported in a motor vehicle except where standardized procedures and guidelines have been established by the WS program and the specific procedures and guidelines concerning such practices are fully implemented (i.e. Sharp Shooting Procedures/Guidelines for White-tailed Deer Damage Management).**

*This adequately addresses “not” to have a cartridge in the chamber while transporting a firearm; however employees cannot be sure if this is in fact the case, unless the chamber is open, and or the bolt is locked to the rear. Several employees who had the bolts of their firearms forward (chamber closed) stated, “There were rounds in the magazine, but not in the chamber”.*

**Recommendation:** This is an unsafe practice, and should be addressed. (The Benelli shotguns in use by many of WS field employees cannot be locked to the rear while there are shells in the magazine so there is no way to visually tell that that a shell is not chambered).

**All WS personnel, regardless of employment status, and official volunteers who are required or requested to use firearms in the conduct of official duties will be provided firearm safety and handling training as prescribed in the WS Firearm Safety Manual.**

*This adequately addresses “who should receive firearm safety and handling training”.*

**New employees must be provided such training or have completed a State Hunter Safety Course or other approved firearms safety-training course within the last year prior to using firearms on the job.**

## Directives

*85% of Employees interviewed were deficient in this requirement. Most Hunter Safety Classes that had been taken by employees and used as prerequisite training for employment had been taken more than a year prior. In at least 75% of these cases, the Hunter Safety class was taken more than 5 years prior and did not include live fire. Hunter Safety class curriculum varies from State to State and the majority no longer includes live fire.*

**Recommendation:** *The State Hunter Safety Course or other approved firearms safety-training course must include a live fire segment. A dated copy of this certificate should be required and retained in personnel files. It should not be deemed acceptable to waive WS firearm safety training for any reason. New employees should not be issued firearms until they have completed WS Firearm Safety Training.*

**All employees who use firearms will take continuing education training on firearm safety and handling biennially.**

*75% of States visited conduct "firearms training" at or during "Annual State Meetings," usually consisting of less than one full day of training to train/ recertify employees in pistol, shotgun, rifle, and pyrotechnics. In at least one State no live fire was conducted.*

**Recommendation:** *Firearm and Pyrotechnics training should be separate, and taught free of the distractions and limitations encountered during a "State Meeting". Curriculum from a nationally recognized organization should be implemented with the addition of other pertinent State firearms training information such as the inclusion of Federal, State and Local Firearm Laws and other relevant training. Live fire should be mandatory.*

**Familiarity of directives by employees.**

*99% of employees interviewed had been provided copies of the directives. 75% were given copies of the WS Firearm Safety Manual. The remaining 25% had accessibility to a copy of the Firearms Safety Manual. While employees were familiar with the directives, there was confusion and misinformation on their part regarding specific policy and procedure. For example, "when it is allowable for a firearm to have a chambered round in a vehicle" was interpreted several ways. Some employees said that when the muzzle of a firearm is out the window, it is not considered "in the vehicle." Some stated, "one foot had to be on the ground outside of the vehicle." Others stated, "If they were in pursuit of wildlife, they could have a round chambered."*



## Directives

**Recommendation:** Directives should be as specific as possible when addressing firearm safety issues especially when involving firearms in a vehicle. Reducing confusion by exacting specific procedure will help to ensure safe gun handling in and out of vehicles.

**All WS employees that use firearms are subject to random drug testing.**

2% of all employees interviewed that use firearms have been randomly drug tested.

**Recommendation:** All employees that use firearms should be drug tested prior to employment. In addition, if a firearms related incident/accident occurs, drug testing should be mandatory.

**WS Directive 2.625 1/01/06**

**Pyrotechnics, Rocket Net Charges, And Incidental Explosive Materials**

This Directive establishes procedures for the safe, secure handling, storage and transportation of pyrotechnics, rocket net charges and other incidental explosive materials for pest control management.

**Pyrotechnics are stored in accordance with ATF regulations, Federal, State and Local Law.**

100% of States visited stored pyrotechnics in State offices or warehouses in appropriate containers in accordance with ATF regulations and Federal, State and Local Law.

**Pyrotechnic ammo is transported and stored in vehicles in IME-22 containers.**

80% of pyrotechnic ammo was properly contained and transported in IME-22 containers. Several employees carried pyrotechnic ammo in their vehicles in zippered pouches.

**Recommendation:** Pyrotechnic ammo should be carried in IME-22 containers as required in the directive.

Directives

***Pyrotechnics will not be stored in the same magazine with rocket net charges or explosives used for removing beaver dams.***

*100% of pyrotechnics observed were properly stored in magazines without rocket net charges or beaver dam explosives.*

***Field personnel are required to document pyrotechnic use.***

*100% of field employees observed using pyrotechnics documented pyrotechnic use.*

***Employees assigned to using pyrotechnic pistols and other launching devices will receive safety training in their use as required Directive 2.615.***

*75% of employees complained that they did not receive adequate training prior to pyrotechnic usage. Several employees while using pyrotechnics were cautioned to treat the pyrotechnic firearm (point in a safe direction), as it was any other firearm. They were not perceived to be "real" firearms.*

***Recommendation:*** *Pyrotechnic training needs to be part of the Firearms Training Program conducted on an annual basis. Training should take place prior to field use.*

***Vehicles must contain fire extinguishers when using Pyrotechnics.***

*In 100% of vehicles where pyrotechnics were being used, fire extinguishers were present. Field employees did say however they did not know how old the fire extinguishers were and when they had been last tested.*

***Recommendation:*** *Fire extinguishers should be tested on an annual basis to assure workability. Employees should receive training on their use.*

## **Administration**

***There is an adequacy of staff at the State, Regional, and National levels to administer an effective firearm safety program.***

*There is an adequacy of staff in place at each of the above levels to ensure that an effective firearm safety plan is both implemented and administered. However, during site visits some deficiencies were noted at each level.*

*State level – State Directors have the ability to administer an effective firearm safety program, however, several of them stated that “budgetary and time management issues often result in not being as effective as they could to be”. One State Director even stated that IT training took precedence over firearm training.*

*Regional Level - Firearm Committee Members have the ability to administer an effective plan, however members of the committee indicated there was no budget or real mission.*

*National Level – The staff at the National level have the ability to administer an effective plan, however, with the exception of the directives, and the WS Firearm Safety Manual, there does not appear to be a “National Plan” regarding Firearm Safety.*

***Wildlife Services has a National Safety Incentive Program in place (Safety Award). It is not specific to Firearm Safety.***

*75% of employees were unfamiliar of or unaware of a safety incentive program (safety award).*

***Recommendation:*** *The award program should be spelled out more clearly to address; the criteria to be nominated, and what winning the award would mean for the recipient. It may also be beneficial for a specific firearm safety award to be instituted.*

***Employees’ attitude and participation in the Wildlife Services Safety and Health Council Improvements and Guidelines.***

*100% of employees thought the concept of the safety and health council were good. Most employees that were the appointed “Coordinators” viewed their positions as nothing more than “additional paperwork”. Half of the Safety Coordinators said that recommendations for improvement or changes that*

## Administration

were related to safety concerns were ignored. Other coordinators said District Supervisors or State Directors told them that they did not have the funding to make the changes.

**Recommendation:** If a Coordinator is appointed to make recommendations for safety improvements, then State Directors and Supervisors should try to implement the recommendations, (to the extent that they are reasonable and cost effective) otherwise the program is ineffective.

### **Supervisor and state director knowledge of activities and hazards**

Knowledge is adequate, as most supervisors and State Directors are familiar with the activities and hazards of fieldwork, having started at that level themselves.

**Recommendation:** As the responsibilities of supervisors and State Directors grow, they need to be careful not to allow their focus regarding firearm safety to shift or become diminished.

### **Supervisor knowledge of safety program requirements**

100% of Supervisors were aware of the safety program requirements,

### **Supervisor monitoring and review of employee field activities**

There are adequate measures in place for the monitoring and review of employees, however, due to the vast amount of land area that each employee often is required to cover, it is difficult for Supervisors and State Directors to have frequent interaction with them.

**Recommendation:** Supervisors and State Directors should attempt to "ride along" with each field employee at least annually.

### **Manager oversight and corrective action.**

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*There are adequate measures in place to provide managerial oversight and to implement corrective action, when warranted. In 99% of responses there were differences in opinion regarding the clear chain of command, the roles and responsibilities, and the transfer of communication among employees, specifically as they applied to firearm safety. Some States did better than others, while there was room for improvement in all. During one visit it was determined that not all employees (including the Firearms Trainer) had been told of the details of an accident that had occurred months earlier. This was a missed opportunity to have employees learn from, and possibly help to prevent a similar reoccurrence in the future. Corrective action appears difficult, with some supervisors having reluctance to take action against fellow WS employees. In addition, firearm safety incidents seem to be perceived as “no big deal.”*

**Recommendation:** *Corrective Action relative to firearm safety incidents should be perceived with greater importance not just by the person(s) involved directly in the incident but also by all of the employees in the State. It should be viewed that any incident affects the reputation of the entire State, all of its employees and the entire Agency.*

**Adequacy of manuals, SOP's, and guidelines.**

*The manuals, SOP's and Guidelines are adequate to address employee safety and the use and transportation of firearms while on official WS business. Employees had been provided copies of the WS Firearm Safety Manual, and were made aware of Standard Operating Procedures and Guidelines through written notice or in-service training.*

*While there is adequate access to these materials, some of the material or information is ambiguous or vague. While this may be by design, to allow State Directors the latitude to tailor information to their particular State Program, where safety was concerned, there should be no room for ambiguity or vagueness.*

**Recommendation:** *The SOP's and Guidelines need to remove some the ambiguity from firearm safety issues. Some of these issues are “shooting from a vehicle”, “when a firearm is considered safe or unloaded”, “safest way to transport”, “storing pyrotechnics in the same container as primers (ignition source)”, etc.*

***Use and understanding of procedures and requirements of manuals, SOP's and guidelines to all staff.***

*Many employees were deficient in this regard. One area that stood out as a major source of concern was the lack of knowledge of the four WS Fundamental Gun Safety Rules. While most employees could name several of them, 100% of employees could not list all four. In addition, there were other areas such as familiarization with the SOP's for cleaning firearms and suppressors; and, the safest way to transport a firearm when use is imminent.*

***Recommendation:*** *Adopt the easy 3 NRA Firearm Safety rules to prevent confusion and simplify: 1. Always point the gun in a safe direction. 2. Keep finger off the trigger until ready to shoot. 3. Keep the gun unloaded until ready to use. Provide specific procedures (removing latitude) for firearm safety issues such as the safest way to transport a firearm when use is imminent.*

***The transfer of information among State, Regional and National Levels.***

*State Level: The sharing of information within the State level varied from State to State, with the majority adequately disseminating information among its employees. The sharing of information appears to have increased, as email and cellular telephone usage has risen. There were isolated instances where employees did not have good lines of communication due to the remoteness of their assignments.*

*State-to-State: There appears to be little communication between States at the level below the State Director. This is unfortunate as many training issues and other concerns expressed by Field Employees and Firearms Trainers could be easily resolved by networking with other States.*

*Regional to National: While a lot of information was transferred, more could be done to make each State aware of any firearm related accidents or incidents. Many State Directors were not familiar with the Firearms Committee or their purpose and/or actions.*

***Recommendation:*** *Provide direction and funding for the Firearms Committee. Establish an information sharing process. This could be as simple as providing a*

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*list of Firearms Trainers' phone numbers or starting a forum strictly used for exchanging ideas.*

***There is a system in place for reporting safety incidents; however; there is no system in place for tracking them.***

*Accidents and/or incidents where there is damage to person or property are reported. We found no information regarding any firearm accidents, incidents, or safety violations, unless they resulted in personal injury, or damage to Government owned property. Upon interviewing Employees, it was found that many incidents go unreported.*

***Recommendation:*** *Devise a tracking system for incidents that fall outside of the damage to person or property guidelines. This could be accomplished with an 800-phone number to report firearm safety violations. The firearms committee would then decide whether an investigation or inquiry is needed and proceed accordingly. In addition, a tracking system may help to identify trends as well as inherently faulty equipment.*

*Note: The auto industry tracks faulty parts and accidents associated with certain automobile models in order to prevent further accidents that could be more detrimental to their corporation and to the public. "Recalls" are a product of this tracking system.*

***The distribution of safety concerns and firearm safety incidents.***

*While the ability exists, and some States are taking advantage of the opportunity to do so, there appears to be limited sharing of information among the States relative to firearm accidents and/or incident. Information shared could include the best methods to prevent reoccurrence as well as the identification of trends.*

***Recommendation:*** *States should develop a sharing information system relative to firearm incidents. While some States may be reluctant to share such information the benefit far outweighs any of the negatives associated with having an accident or incident. Perhaps the Firearms Safety Committee could facilitate this.*

## **Firearm Training Program Evaluation During Site Visits**

### **Requirement for firearm safety training**

*The WS Directives, Firearms Safety Manual, and Standard Operating Procedures adequately address the need for both classroom and range training. Employees that use firearms should successfully acquire the knowledge, skill, and attitude necessary to safely handle, use, and transport firearms in their official capacity as WS employees.*

### **Training instructor qualifications**

*The WS Firearms Safety Training Manual, and WS Directive 2.615 (WS Firearm Use and Safety) recognize the importance of utilizing Certified Instructors from a Nationally Recognized Institution (e.g. the NRA). In 6 of the States visited 4 had NRA certified Instructors in place to train or develop a firearms safety program. In 2 States, the firearms trainers were unavailable.*

**Recommendation:** *Firearms trainers should be NRA certified to provide continuity in training.*

### **Adequacy of training materials**

*The WS Firearm Safety and Training Manual is the source of information that most programs are utilizing as the basis for their firearms and pyrotechnic training. While the manual addresses many aspects of firearms safety, it is not detailed enough to be used as a stand-alone reference. Furthermore should be updated periodically.*

**Recommendations:** *Firearms safety materials and training should be uniform for all Wildlife Services employees, regardless of where the training takes place. The only way to ensure this, would be to make the WS Firearm Safety Training Manual more comprehensive, create a stand alone Firearms Safety Training Lesson Plan, or to utilize the materials already in place by a nationally recognized institution (e.g. the NRA) with the addition of materials relevant to Wildlife Services (such as pyrotechnic use, shooting from vehicles, dispatching wildlife in traps etc.).*



## Firearm Training Program Evaluation During Site Visits

**Recertification training and frequency**

Recertification is not specifically addressed other than stating in the directives that firearms training will be conducted biennially.

**Recommendation:** Provided that employees initially complete basic rifle, pistol, and shotgun training (e.g. NRA Basic Rifle, Shotgun, Pistol courses); training should be required for recertification on an annual basis with the abridged lesson plans such as the NRA First Steps Rifle, Pistol, and Shotgun. All field employees that use any type of firearm should be required to meet a proficiency level or qualification. Documentation of this should be retained in the employee's file. Employees should not be issued any firearm for which they cannot attain minimum proficiency.

**Effectiveness of the firearms training program.**

The WS Firearms Safety Training Program is effective, and continues to train highly skilled and motivated employees. As the need to hire additional employees that have little or no firearm experience, so does the need to ensure adequate training for them. State Directors, District Supervisors and Field Employees told us that a smaller number of potential employees are applying for new job openings, and the applicants applying have less firearms experience than in the past. This necessitates more training at a basic level.

**Recommendation:** Require training and recertification on an annual basis. New employees should not be issued firearms until they have completed a firearms training program (this could even be arranged through an NRA Instructor outside of the agency). This is more important than has been in the past because of the diminished skill level of applicants. Require a minimum proficiency shooting level for shotgun, rifle and handgun. These firearms should only be issued to those that meet or exceed the minimum proficiency levels.

**Tracking and documentation of firearm training.**

There is a tracking requirement in place to document training that an employee receives; WS Form SF 182 (or similar form). All but one of the State Directors interviewed opted to use a different system for recording firearms training. Some

## Firearm Training Program Evaluation During Site Visits

*systems were adequate including files that kept employee exams, scored targets or target results, attendance at training, and other pertinent information. One State developed its own certification checklist that tracks proficiency on a pass/fail basis for all of the pyrotechnics and firearms used. Others needed to update the files with and include some of the above information.*

**Recommendation:** *Revise the SF 182, or devise a different form altogether, to make it less time consuming to fill out.*

### **Availability of relevant safety information and equipment during training**

*There was an adequacy of ear and eye protection and other needed safety equipment; however, safety information outside of manual or book information was absent everywhere visited. There was no Firearm Safety posters or static displays.*

**Recommendation:** *Display firearm safety posters and other visual safety information to reinforce safety on bulletin boards, safes and in vehicles.*

## **Firearm Training Program Observation and Evaluation**

### **Availability of relevant safety information and equipment during training.**

*There was an availability of appropriate training aids including a power point presentation during the classroom segment. An exam was appropriately administered and discussed after use. Firearms were safely handled during the classroom training.*

*There was an availability of relevant safety equipment including ear and eye protection during live fire training. 100% usage was witnessed during live fire training.*

### **Knowledge of and adherence to safety policies during live fire training.**

*Employee knowledge of and good adherence to the WS Safety Policies were observed during live training.*

### **On-site hazard communication rules during live fire training.**

*On site hazard communication rules were reviewed prior to the range training, and were adhered to. The communication rules were adequate.*

**Recommendation:** *Control of firing line should include the use of loud, consistent commands.*

### **Firearms used during firearm training.**

*All firearms used during training were Government owned. Training should be conducted with the firearms that employees use on a regular basis in the course of their jobs.*

### **Transportation of firearms to and from the range.**

*Firearms were transported to and from the range in accordance with WS policy. No discrepancies were noted.*

## *Firearm Training Program Observation and Evaluation*

### ***Handling of firearms during live fire.***

*Firearms were handled in accordance with WS Firearms policy. If firearms were not handled properly, the Firearms Trainer, State Director or other employee were quick to correct the employee.*

### ***Storage of the firearms before, during and after live fire.***

*Firearms were stored in accordance with WS Firearms policy. No discrepancies were noted.*

### ***Equipment condition of firearms used during live fire exercises.***

*An inspection confirmed that all firearms were in good serviceable condition. All safety equipment was clean and serviceable.*

## **Field Inspection Review**

### **Observation of employee adherence to policy, manuals, safety procedures, and guidelines.**

*On three of the site visits deer management teams conducting fieldwork in urban areas and airports adhered to WS policies, manuals, safety procedures, and guidelines during deer management collection 100% of the time. These teams were among the highest skilled WS employees observed during the Safety Review. This may be attributable to the advanced (sharpshooter) training they had previously undergone, the knowledge that urban areas pose a greater risk for damage or injury, and the use of teamwork to verify all safety rules were followed.*

*Of the remaining five field visits (ride alongs) 75 % of employees adhered to firearm safety policy, manuals, safety procedures and guidelines. Three employees who did not adhere to pyrotechnic and safe firearm transportation procedures were cautioned.*

### **Personal protection and safety equipment used during “ride alongs.”**

*Personal protection equipment was available and used 100% of the time by Wildlife Services employees during the performance of their duties when deemed necessary. Equipment included, but was not limited to, cold weather gear, eye protection, ear protection, and latex gloves. First Aid kits were available in all vehicles.*

### **Hazard communication plan application.**

*100% of Field employees used communication systems (particularly during airport field operations) appropriately and expertly. Cell phones were also utilized when needed on field operations. There was at least one location where cell service was unavailable during field operations. This is common in very remote rural areas.*

### **Recordkeeping of field employees during field operations.**

*100% of Wildlife Services employees observed kept adequate records to monitor their daily activities, their productivity, and help to provide information valuable to cooperators and their State Office.*

## Field Inspection Review

### ***Transportation of firearms during field operations.***

*With the exception of one isolated incident, firearms were properly transported during all field operations.*

### ***Equipment condition during field visits.***

*The majority of the equipment inspected was in very good to excellent condition. Firearms were clean and serviceable, with (2) exceptions. One rifle was deemed to be unsafe, (safety was inoperable, and trigger pull weight had been reduced). Upon discovery the rifle was taken out of service for inspection and repair. One shotgun was deemed unserviceable and had been stored in a safe at the State Office. Following the inspection, employees tagged the shotgun to prevent use.*

***Recommendation:*** *Firearms used in the performance of Wildlife Services duties should not be modified without the approval of the State Director. Any modifications must be made by a certified gunsmith.*

### ***Frequency of maintenance of firearms used for field operations.***

*Equipment appeared to be well maintained with the exception of the items listed above. Employees did state that they would like the firearms to be inspected periodically.*

***Recommendation:*** *Inspection of all firearms should be conducted periodically.*

## **Accident Review**

*In the following cases we found that the incidents/accidents could be categorized as a result of: Ignorance (not have adequate knowledge or skill), Carelessness (violation of the firearm safety rules) and Negligence (an attitude where there is complete disregard for the firearm safety rules).*

### **FIREARM ACCIDENTS INFORMATION RECEIVED FOR 2003-2008**

*Case 1  
February 2008  
Western Region  
Cause: Ignorance*

*A government owned vehicle sustained damage to the passenger side floorboard when a Wildlife Services Technician discharged his issued Benelli shotgun inside the vehicle. The shotgun discharged when the employee was reaching for it, and inadvertently came into contact with the trigger. No injuries were reported.*

**Conclusion:** *The following WS Firearm Safety Rules were violated:  
Employee failed to keep finger off the trigger until ready to shoot.  
The firearm was not unloaded until ready to use*

*Case 2  
September 2007  
Western Region  
Cause: Negligence*

*A government owned vehicle sustained damage to the passenger side door when a Wildlife Services Technician discharged his Benelli shotgun inside the vehicle. Employee stated that the firearm discharged while he was reaching for it, and preparing to depart the vehicle. No injuries were reported.*

**Conclusion:** *The following WS Firearm Safety Rules were violated:  
Employee failed to keep finger off the trigger until ready to shoot  
The firearm was not unloaded until ready to use*

*\*In our opinion, the employee may have been attempting to shoot out of the opened passenger side window, a practice he had been warned on several occasions not to do.*

Accident Review

Case 3  
March 2008  
Western Region  
Cause: Negligence

*A Wildlife Services Technician caused damage to the front and rear passenger side doors of his government owned vehicle. Employee stated that he was transporting his Benelli shotgun in a padded, soft side case, safety on, with the bolt locked open on an empty chamber, with live rounds in the magazine. Employee further stated that while driving the vehicle down a series of dirt roads, the bolt closed, causing a round to enter the chamber, the safety disengaged, and that the trigger may have inadvertently been bumped by some of the gear he had in the rear of the truck near the rifle case. No injuries were reported.*

**Conclusion:** *The following WS Firearms Safety Rules were violated:  
Employee failed to keep finger off the trigger until ready to shoot  
The firearm was not unloaded until ready to shoot.*

*\*In our opinion, it is hard to believe that this accident could have occurred as stated. The bolt on a Benelli shotgun will not lock to the rear when there is ammunition in the magazine.*

Case 4  
September 2007  
Eastern Region  
Cause: Carelessness

*A Wildlife Services Technician suffered a self-inflicted wound to her leg while using an air rifle. The employee, who had been shooting at pigeons, stopped to allow an oncoming vehicle to pass. The air rifle was held behind her to shield it from view, and as the rifle was brought back into service, it discharged, striking her left leg just above the ankle.*

**Conclusion:** *The following Wildlife Services Firearm Safety Rules were violated:  
Employee failed to keep firearm pointed in a safe direction  
The firearm was not unloaded until ready to use  
Employee did not keep her finger off the trigger until ready to shoot*



Accident Review

Case 5  
December 2006  
Western Region  
Cause: Carelessness

*A Wildlife Specialist suffered serious injury when he was struck in the leg when a round discharged from his issued Remington 700. The employee was conducting coyote control operations, and was collecting a blood sample from a coyote he had just taken. He stated that he was reaching behind himself to grasp the frame of the rifle to un-sling it, but inadvertently made contact with the trigger. Employee suffered injury to his left leg.*

**Conclusion:** *The Following Wildlife Services Firearm Safety Rules were violated:  
Employee failed to keep his firearm pointed in a safe direction  
Employee failed to keep his finger off the trigger until ready to shoot  
The firearm was not unloaded until ready to use*

Case 6  
July 2008  
Eastern Region  
Cause: Carelessness

*Damage occurred to a government owned Remington 11-87 shotgun while in use by a Wildlife Services Technician. While shooting, a plastic wad did not clear the barrel and another round was fired, causing a rupture in the end of the shotgun's barrel. No injuries were reported.*

**Conclusion:** *No Wildlife Services Firearm Safety Rules were violated.*

*\*Better knowledge of common ammunition malfunctions may have prevented this. i.e.( squib load procedures)*

Accident Review

*Case 7  
September 2007  
Western Region  
Cause: Ignorance*

*An AWC suppressor suffered damage while being used by an Assistant District Supervisor. The suppressor had operated properly for three shots, on the fourth one, a perceptible delay occurred, followed by an explosion. AWC could provide no information as to regards of the possible cause. No injuries were reported.*

***Conclusion:*** *No Wildlife Services Firearm Safety Rules were violated.*

*\*Several factors may have contributed to the incident, such as improper cleaning with flammable materials, and shooting 17HMR ammunition (which is higher pressured) in a .22 caliber suppressor.*

## **Accident Review and Incident Summary**

*Combinations of telephone and in person interviews were conducted with regard to each listed accident or incident. Interviews included affected employees, supervisors and State Directors. Information received in interviews matched the statements given in the original accident reports.*

**Possible Causes:** *Cases 1-5 could have been prevented had Wildlife Services Firearm Safety Rules that are already in place, been followed. Our findings concluded that the two firearms incidents cases 6 and 7 might not have been preventable under working conditions.*

**Recommendation:** *Wildlife Services Employees must adhere to all of the basic rules of firearms safety. In addition to following these rules, it must become second nature for employees to utilize the safeties on their firearms. While a safety is a mechanical device that can fail, none of the firearm accidents was a result of this happening. All five accidents could have been prevented if the affected employee had utilized the safety on their firearm. In addition, shotguns that are to be used by WS Employees must be capable of locking to the rear. If a procedure calls for locking the bolt to the rear to check for a clear chamber and the bolt cannot be locked to the rear without unloading the magazine, then the first procedure must be to unload it. Being able to determine whether a shell is chambered in a shotgun by locking the bolt to the rear is crucial for firearm safety. It is very important that proper training accompany each firearm that is to be used prior to its issuance to employees.*

## **Firearm Safety Review Summary**

*Wildlife Services provides Federal leadership in managing conflicts with wildlife. Human-wildlife conflict is and will continue to be a major issue as humans encroach upon wildlife in their natural habitats. While wildlife management employs the use of many tools to minimize this conflict, the most effective tools used for control and management are firearms. Firearm use is especially important when immediate action is necessary to protect the lives of others, or to minimize risk such as the damage to aircraft. Wildlife damage to aircraft is not only costly but can also be hazardous to human life. It is therefore imperative that WS employees be highly skilled in their use of firearms.*

*As urbanization continues to increase, so will the human-wildlife conflict. Wildlife Services finds itself faced with the challenges of hiring and training new employees, as well as providing refresher training to current employees. This task is made even more difficult as fewer employees have the background in hunting, trapping or general firearms use. The past necessity of hunting to put food on the table rarely exists today. Hunting has become more of a pastime or sport, which has also become increasingly difficult to pass down from parent to child because of legal restrictions and land development issues. The number of places available for recreational shooting has declined which further adds to this dilemma. Wildlife Services is being faced with the possibility of hiring Biologists or Field Employees with little or no firearm experience. This further demonstrates the importance of having a sound firearms training program that will meet the needs of both the beginner and experienced shooter.*

*During our initial site visit we met with the Chairman of the Firearms Safety Committee who stated, "Wildlife Services' goal is to be at the forefront in firearms safety among all government agencies". Upon completion of the review, it was apparent that Wildlife Services is an agency with employees that share this same goal, who demonstrate a willingness to learn and who have a genuine desire to act in a safe and responsible manner.*

*Wildlife Services has implemented a comprehensive firearm safety program for its employees, resulting in well- trained staff, employees that are knowledgeable with the safe use, transport, and storage of firearms, and the ability to perform their jobs with a high degree of competence. When compared to employees of other federal and law enforcement agencies, WS Field Employees discharge their firearms significantly more on a daily basis. While it was difficult to calculate from the WS data that is presently recorded, it is noteworthy, that the number of*

*firearm related incidents, relative to the number of rounds fired, is disproportionately low. On the rare occasion that a firearm incident occurs, it is generally the result of an employee failing to comply with WS stated policies and procedures, or failing to exercise the fundamental rules of safe gun handling.*

*Strict adherence to these rules, a continued emphasis on training, and an active and well documented training program in each State will minimize the chances of further firearms incidents.*

*Demonstrating the importance of these principals (through actions and attitude) at each of the various levels within Wildlife Services will help to ensure that this goal continues to be met.*

## ***Recommendations for the WS Safety Review***

- 1. Wildlife Services firearm safety training should be standardized. The NRA is the only Nationally recognized Firearm Safety Training organization. WS should adopt the use of NRA certified Instructors, use of NRA curriculum (to include their 3 fundamental safety rules) and certification for Pistol, Rifle and Shotgun, NRA proficiency standards, NRA Testing, and NRA certification for WS employees. Additional state related firearm safety training may be added such as information regarding concealed carry laws.*
- 2. The Firearm Safety Committee should be tasked with devising a system to track all firearm related accidents, incidents and safety violations, regardless of whether injury or property damage has occurred. A toll free anonymous hotline should be instituted in addition to other reporting mechanisms. The committee should develop an investigative process to respond to reports of unsafe firearm situations. Guidelines should be developed for stricter disciplinary action regarding firearm accidents/incidents to include mandatory drug testing and retraining.*
- 3. WS Directives should clearly address whether shooting out of vehicles is allowed. Additionally, directives should clearly address what is defined as "out of vehicles" e.g. muzzle out window, person completely out of vehicle. If shooting out of vehicle is indicated, a procedure for transporting the firearm while in pursuit of wildlife should be clearly addressed.*
- 4. Firearms should be transported in vehicles in an approved rack system or hard sided case. When use is not imminent the bolt should be locked to the rear, magazines removed or empty and safeties on.*
- 5. All firearms that are used in WS job capacity should be inspected annually. All work performed on these firearms should be initially approved by the State Director and the work should be conducted only by a certified gunsmith. Firearms should be inspected periodically to ensure proper functioning of actions and safeties.*